

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY
LITIGATION**

**THIS DOCUMENT RELATES TO ALL
CASES**

**Master File No. 2:12-MD-02327
MDL No. 2327**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

**DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO QUASH THE CROSS
NOTICE OF VIDEO DEPOSITION OF CHUCK AUSTIN**

Defendants Ethicon, Inc. and Johnson & Johnson (collectively “Ethicon”) hereby oppose Plaintiffs’ Motion to Quash the Cross Notice of Video Deposition of Chuck Austin [Docket No. 1658]. Nevertheless, Ethicon will not burden the Court with a detailed substantive response, as there is no immediate dispute warranting resolution of Plaintiff’s motion in light of the fact that the deposition has already taken place and Plaintiffs are not presently seeking another deposition of Mr. Austin in the MDL. However, Ethicon reserves its right to file a more detailed submission to the extent a concrete dispute later arises with respect to the position Plaintiffs take in their motion.

Respectfully submitted,

ETHICON, INC. AND
JOHNSON & JOHNSON

/s/ Christy D. Jones _____

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CERTIFICATE OF SERVICE

I, Christy D. Jones, certify that on August 25, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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